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April 29, 2022

Dear Senators and Members of Congress:

The Council for Federal Cannabis Regulation (CFCR) wishes to register our support of the April 27, 2022 [Consumer Brands Association \(CBA\) letter](#), which provides language to improve consumer safety in relation to cannabis products.

CFCR is a non-profit organization working to educate federal policy makers and regulators about the immediate need for science informed regulation of all cannabis products.

Product safety for American consumers of cannabis products is CFCR's highest priority. In fact, CFCR brought the same concerns to Health and Human Services (HHS) in a letter dated December 12, 2021 ([link](#)) and applauds CBA's proposed solution to misleading packaging of cannabis products. CFCR urges Congress to consider this solution and adopt it with immediacy before a child dies, which is an eventual reality if this market continues to grow unchecked and unregulated.

We at CFCR believe that these incidents of cannabis products being marketed to children online points to a broader health and safety issue, as well as the need to legalize and regulate all cannabis products at the federal level. Until cannabis is federally regulated, unsafe products will continue to flood the market and these problems will only persist and worsen.

We at CFCR continue to call on the FDA to:

1. Address what is lacking in the regulatory pathways, clinical trials, and toxicology studies being completed in Europe and the UK.
2. Identify on the quality of the scientific research and the additional toxicology studies or other data needed from FDA's perspective, and to make this information public.
3. Work with CFCR and industry to support and accomplish this research; and
4. Develop a guidance document immediately as it begins to develop a regulatory pathway for all legal cannabis products.

CFCR remains supportive of the continued calls on Congress to work expeditiously on comprehensive and equitable cannabis legalization. Additionally, we support this approach to product safety taken by CBA.

CFCR also wishes to reinforce our support for better regulatory preparedness as recently set forth in the bipartisan [PREPARE Act introduced by Rep. David Joyce](#) last week.

Sincerely,

Executive Director

www.uscfc.org